

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

SAEID SHAFIZADEH

COMPLAINANT

CASE NO.: 2003-00400

v.

CINGULAR WIRELESS-KENTUCKY

DEFENDANT

**CINGULAR WIRELESS'S SUPPLEMENT TO ITS INITIAL REQUEST FOR  
PRODUCTION OF DOCUMENTS AND INTERROGATORIES TO COMPLAINANT**

On March 8, 2004, BellSouth Mobility, LLC, d/b/a Cingular Wireless ("Cingular"), filed its request for an informal conference in these proceedings and to suspend the procedural deadlines. On March 9, 2004, BellSouth Mobility, LLC, d/b/a Cingular Wireless ("Cingular"), filed its Initial Request for Production of Documents and Interrogatories to Complainant ("Initial Requests") in accordance with the scheduling order in effect at that time in order to preserve its discovery rights. In the Initial Requests, Cingular reserved its right to amend and supplement those requests in anticipation of subsequent Commission action in this case. On July 8, 2004, the Commission entered an order setting July 18, 2004 as the date on which discovery requests must be submitted ("Scheduling Order"). The Scheduling Order further provided that responses to the Initial Requests are due on or before August 12, 2004.

In accordance with the preceding paragraph, Cingular, by counsel and pursuant to the Scheduling Order, tenders to the Complainant the following supplement to the Initial Requests to be

answered under oath and within twenty (20) days from the date of service.

**SUPPLEMENTAL INTERROGATORIES**

**SUPPLEMENTAL INTERROGATORY NO. 1:** Please state the names and addresses of all persons assisting in the preparation of the answers to these interrogatories and indicate which persons answered which interrogatories.

**RESPONSE NO. 1:**

**SUPPLEMENTAL INTERROGATORY NO. 2:** Please indicate whether any conversations between the Complainant and any Cingular representatives, employees, or agents were taped or otherwise recorded by or on behalf of the Complainant or an agent of the Complainant, and if so, for each such conversation (1) identify the date of the taped conversation, (2) the name of the person recording the conversation, (3) the name of the persons recorded or taped, (4) whether a written transcription or summary of the conversation exists, (5) whether the original tape or recording exists, and if so, the name, address and telephone number of the person in possession of that recording, and (6) indicate whether permission to tape or record the conversation was requested and, if so, whether such permission was granted.

**RESPONSE NO. 2:**

**SUPPLEMENTAL INTERROGATORY NO. 3:** Please describe in detail and with particularity the circumstances concerning the mailing or other transmission of the check dated July 8, 2003 and numbered 5592 in the amount of \$55.46 which is alleged to have been tendered in payment of the charges at issue in this proceeding, including, without limitation, (a) the name,

address and telephone number of the person who made out the check, (b) the date the check was prepared, (c) the date the check was mailed, (d) the name, telephone number, and address of the person who mailed the check, (e) the location where the check was deposited into the mail, (f) the address to which it was mailed, (g) the name of the signatory of the check, (h) the account on which the check was drawn, (i) the holder of the account on which the check was drawn, (j) a description of the check (e.g., preprinted or computer generated) and any modifications to the check numbers encoded or otherwise printed or written on the check, (k) indicate whether any coupons, billing statement or other materials were included with the check when mailed, and if so, identify those materials, (l) a description of the envelope in which the check was mailed, and (m) identify any and all persons who handled the check prior to mailing other than those identified above and identify what those persons did with the check and indicate the status of the check at that time (e.g., whether it was in an envelope, whether the envelope was sealed, whether the check was completed).

**RESPONSE NO. 3:**

**SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS**

**SUPPLEMENTAL REQUEST NO. 1:** If the response to Supplemental Interrogatory No. 2 above is in the affirmative, please make available the original tapes or recordings referenced therein and please provide a copy of any written transcripts or summaries thereof.

**RESPONSE NO. 1:**

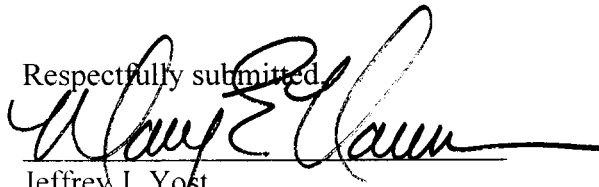
**SUPPLEMENTAL REQUEST NO. 2:** Please provide a copy of any and all documentary evidence which supports your response to Supplemental Interrogatory No. 3 above.

**RESPONSE NO. 2:**

**SUPPLEMENTAL REQUEST NO. 3:** Please provide copies of any and all notes of the Complainant's conversations or other communications with any Cingular representatives, employees, or agents.

**RESPONSE NO. 3:**

Respectfully submitted,



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*Counsel for BellSouth Mobility, LLC d/b/a Cingular  
Wireless*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing was served by depositing a copy in the United States mail, First Class, postage prepaid and addressed to the following, on the 18<sup>th</sup> day of July, 2004.

Saeid Shafizadeh, Complainant  
Attorney at Law  
P.O. Box 21244  
Louisville, Kentucky 40221



Jackson Kelly PLLC

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